

THE E CUBED COMPANY, L.L.C.

E3

Providers of
Strategic Energy
Services At
The Exponential
Interface Among

- Energy
- Economics and
- Environment

Ruben S. Brown,
M.A., M.A.L.D.,
President

Arthur W. Pearson,
CEM
Director, Project
Operations

January 20, 2006

Hon. Jaclyn A. Brillig
Secretary
State of New York Public Service Commission
Three Empire Plaza
Albany, NY 12223

Re: Case 03-E-0641 – Proceeding on Motion of the Commission Regarding
Expedited Implementation of Mandatory Hourly Pricing for Commodity
Service

Dear Secretary Brillig:

Enclosed please find the comments of the Joint Supporters and The E Cubed
Company, LLC in regards to the National Grid/NIMO compliance filing in the above
referenced matter.

Very Truly Yours,



Ruben S. Brown, M.A.L.D.
President, The E Cubed Company,
L.L.C.

Encl:

cc. Arthur Pearson

Comments of the Joint Supporters and The E Cubed Company, LLC Regarding the National Grid Compliance Filing in Case 03-E-0641 – Proceeding on Motion of the Commission Regarding Expedited Implementation of Mandatory Hourly Pricing for Commodity Service

On September 23, 2005 the Commission issued an Order (Order Instituting Further Proceedings and Requiring the Filing of Draft Tariffs) that required certain New York utilities to file draft tariff leaves that provide for mandatory hourly pricing (“MHP”) “for their largest customer classifications that provide for service at mandatory time-of-use rates”. National Grid was also required to expand its extant offering and to include in its plan an outreach and education efforts, a plan to make interval metering available and to provide additional tools to its customers with respect to this matter.

On November 22, 2005 National Grid (“Company”) submitted their compliance filing to the Commission. In doing so the Company, among many other things, requested that the costs it experiences as a result of implementing the Commission’s Order should be covered by NYSERDA out of SBC funds.

The Joint Supporters is totally opposed to the use of NYSERDA/SBC funds for such a purpose. We see no reason why the funding of the costs experienced by the Company in complying with the Order should be paid for in any way other than the methodology employed by the Consolidated Edison Company. In their case they are collecting the required funds directly from their customers via already established procedures. We see no justification for the Company to utilize NYSERDA funding for this purpose and therefore respectfully request that the Commission reject it.

We thank the Commission for the opportunity to comment on this Case and look forward to working with it, the Company and the other interested parties in ensuring the final result achieves the Commission’s objectives.